

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Biewer Sawmill Winona, Inc.
625 Sawyer Road
Winona, Montgomery County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: August 29, 2023

Effective Date: As Specified Herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: July 31, 2028

Permit No.: 1860-00035

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APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT

SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or the EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be

revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Mississippi Department of Environmental Quality (MDEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 1.5 The permittee shall furnish to the MDEQ within a reasonable time any information the MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the MDEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to the MDEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(e).)

- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit or the application of any provision of this permit to any circumstances is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(5).)

- 1.8 The permittee shall pay to the MDEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order, which shall be issued in accordance with the procedure outlined in Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for Purposes of Title V of the Federal Clean Air Act”.

- (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant

for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g. air emission factors); or other approaches such as engineering calculations (e.g. estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A.(2).)

- (c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.(2).)

- (d) The fee shall be due September 1 of each year. By July 1 of each year, the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the MDEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- (e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(8).)

- 1.10 Any document required by this permit to be submitted to the MDEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the MDEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to perform the following:

- (a) Enter upon the permittee's premises where a Title V source is located, emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C.(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I.(1).)

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I.(2).)

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F.(1).)

- 1.15 Nothing in this permit shall alter or affect the following:
- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F.(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V Operating Permit (TVOP). If the permittee submits a timely and complete application, the failure to have a TVOP is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the MDEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C.(2)., R. 6.4.B., and R. 6.2.A.(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) The changes are not modifications under any provision of Title I of the Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [at least seven (7) days, or such other timeframe as provided in other regulations for emergencies] and the notification includes the following:
 - (1) A brief description of the change(s);
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F.(1).)

- 1.19 Should the Executive Director of the MDEQ declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 3 – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Mississippi Administrative Code, Title 11, Part 2, Chapter 2 – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment” – and may require modification of this permit in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 6 – “Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act”.

“Modification” is defined as [a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I (or 40 CFR 51.166); or
 - (2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166).
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I (or 40 CFR 51.166); or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C.(15).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally-approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B.(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvi-cultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up

operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of the MDEQ and must meet the following buffer zones.

- (a) Open burning without a forced-draft air system must not occur within five hundred (500) yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

- (a) Except as otherwise specified herein, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in Part (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of the emergency the permittee took all reasonable steps to

minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- (4) The permittee submitted notice of the emergency to the MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, start-ups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or

caused a general nuisance to the public, the source provided notification to the Department.

- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this Mississippi Administrative Code, Title 11, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.10.B.(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Mississippi Administrative Code, Title 11, Part 2, Chapter 1, Rule 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

- 1.27 Regarding compliance testing (if applicable):

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include (but not be limited to) the following:
 - (1) Detailed description of testing procedures;
 - (2) Sample calculation(s);
 - (3) Results; and
 - (4) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B.(3), (4), and (6).)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Facility-Wide (Biewer Sawmill Winona, Inc.)
AA-001	Sawmill Operations [includes debarking, sawing, chipping, and grinding] [<i>fugitive</i>]
AA-002	Bark Hog
AA-003	Two (2) Green Wood Chip Screen [separates (by size) woods chips / sawdust received from the Sawmill Operations]
AA-004	Green Wood Chipper [receives and processes oversized wood chips from Green Wood Chip Screen]
AA-005	No. 1 Continuous Direct-Fired Lumber Drying Kiln [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-006	No. 2 Continuous Direct-Fired Lumber Drying Kiln [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-007	No. 3 Continuous Direct-Fired Lumber Drying Kiln [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]
AA-008	Planer Mill Operations [includes Planer Mill Block Hog and conveyance of dry shavings to Dry Shavings Bin – all emissions are routed to a cyclofilter (a combination cyclone and baghouse control unit)]
AA-009	Wood Byproduct Handling [includes the bulk material conveyance, storage, load-out, and off-site shipping of both green and dry wood byproducts] [<i>fugitive</i>]
AA-010	Paved Haul Roads [<i>fugitive</i>]
AA-011	Above-Ground Storage Tanks [includes one (1) 3,000-gallon gasoline tank, one (1) 12,000-gallon diesel tank, one (1) 11,000-gallon diesel tank, and one (1) 350-gallon diesel tank]
AA-012	174 HP (130 kW) Natural Gas-Fired Emergency Generator Engine [total heat input: 1.8 MMBTU / hour; manufactured in 2022]
AA-013	315 HP (235 kW) Diesel-Fired Emergency Fire Water Pump Engine [total heat input: 2.21 MMBTU / hour; manufactured in 2021]
AA-014	No. 4 Continuous Direct-Fired Lumber Drying Kiln [equipped with 38.76 MMBTU / hour natural gas-fired, low-NO _x burner]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process that exceeds forty (40) percent opacity subject to the exceptions provided below:

- (a) Start-up operations may produce emissions that exceed 40% opacity for up to fifteen (15) minutes per start-up in any one (1) hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one (1) hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause or allow the discharge into the ambient air from any point source any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.A.3 The permittee shall not cause or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.B.1	PM (filterable)	$E = 4.1 \cdot (p^{0.67})$
AA-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 (PSD Avoidance Standard)	3.B.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirement (Partial Enclosure)
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 (PSD Avoidance Limit)	3.B.3	Green Wood By-Products	192,750.0 tpy (Rolling 12-Month Total)
AA-005 AA-006 AA-007 AA-014	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).	3.B.4	PM (filterable)	$E = 0.8808 \cdot (I^{-0.1667})$
	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 and modified in the Title V Operating Permit issued August 29, 2023 (to include AA-014) (PSD BACT Limits)	3.B.5	VOCs (as WPP1)	4.80 lb. / MBF (Each Kiln) 840.0 tpy (for Combined Kilns; Rolling 12-Month Total)
		3.B.6	Dried Lumber Throughput	350.0 MMBF / Year (Combined Kiln) (Rolling 12-Month Total)
		3.B.7	Final Moisture Content	≥ 10.0% (30-Day Block Average)
		3.B.8	Max. Operating Temperature	275.0°F (30-Day Block Average)
	11 Miss. Admin. Code Pt. 2, R. 2.15.C, as established in the Title V Operating Permit issued August 29, 2023 (PSD Avoidance Limit)	3.B.9	Total Heat Input	1,018,613.0 MMBTU / Year (Rolling 12-Month Total)
	40 CFR Part 63, Subpart DDDD – NESHAP: Plywood and Composite Wood Products 40 CFR 63.2231(a) and (b); Subpart DDDD	3.B.10	HAPs	General Applicability
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 (PSD Avoidance Standard)	3.B.11	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirement (Cyclofilter)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-008	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 (PSD Avoidance Limit)	3.B.12	Planer Mill Operations	6,000.0 Hours / Year (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021	3.B.13	Differential Pressure Drop Range	$0.2 \leq \Delta P \leq 6.0$ (in inches of H ₂ O)
AA-011	11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 (PSD BACT Standard)	3.B.14	VOCs	Apply and Maintain “Light” or “White” Coating; or Install and Maintain a Rooftop Cover
AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).	3.B.15	PM (filterable)	0.6 lb. / MMBTU
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6585(a), (b), and 63.6590(c)(7); Subpart ZZZZ	3.B.16	HAPs	General Applicability
	40 CFR 60.4243(d)(1) – (3); Subpart JJJJ 40 CFR 60.4211(f)(1) – (3); Subpart IIII	3.B.17	Operational Requirements	100 Hours / Calendar Year for Maintenance and Readiness Testing; 50 Hours / Calendar Year for Non-Emergency Situations
AA-012	40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 CFR 60.4230(a)(4)(iii) and (iv); Subpart JJJJ	3.B.18	NO _x CO VOCs	General Applicability
	40 CFR 60.4233(e), 60.4234, and Table 1; Subpart JJJJ	3.B.19	NO _x	2.0 grams / HP-hr (or 160 ppmvd at 15% oxygen)
			CO	4.0 grams / HP-hr (or 540 ppmvd at 15% oxygen)
	40 CFR 60.4243(e); Subpart JJJJ	3.B.20	Fuel Alternative	Combust Propane for 100 Hours / Calendar Year

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-013	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2); Subpart III	3.B.21	NMHC + NO _x CO PM	General Applicability
	40 CFR 60.4207(b); Subpart III	3.B.22	Fuel Requirement	15 ppm Sulfur Content (Max.); and 40 Cetane Index (Min.) or 35% Aromatic Content (Max. – by volume)
	40 CFR 60.4205(c), 60.4206, and Table 4; Subpart III	3.B.23	NMHC + NO _x	4.0 grams / kW-hr (or 3.0 grams / HP-hr)
			CO	3.5 grams / kW-hr (or 2.6 grams / HP-hr)
			PM	0.20 grams / kW-hr (or 0.15 grams / HP-hr)

3.B.1 For Emission Point AA-000 (Facility-Wide), unless otherwise specified herein, the permittee shall not allow the emission of particulate matter (PM) in total quantities in any one (1) hour from any manufacturing process (which includes any associated stacks, vents, outlets, or combination thereof) to exceed the amount determined by the relationship:

$$E = 4.1 \cdot (p^{0.67})$$

where “E” is the emission rate in pounds per hour and “p” is the process weight input rate in tons per hour. The conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).)

3.B.2 For Emission Points AA-001, the permittee shall ensure the structural integrity of the building and/or the enclosure that contains the referenced source activities is sustained as a partial enclosure.

For the purpose of this permit, “*partial enclosure*” shall be defined any structure comprised of walls or partitions on at least three sides or three-quarters of the perimeter surrounding process equipment to prevent the entrainment of filterable PM into the air at a minimum of ninety (90) percent reduction efficiency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 – PSD Avoidance Standard)

3.B.3 For Emission Points AA-002 and AA-004, the permittee shall limit the total quantity of

green wood by-products (e.g., bark, wood chips / sawdust, etc.) chipped, hogged, and/or grinded to no more than 192,750.0 tons per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 – PSD Avoidance Limit)

- 3.B.4 For Emission Points AA-005, AA-006, AA-007, and AA-014, the maximum emission permissible of ash / PM from any fossil fuel-burning installation with a heat input equal to or greater than ten (10) million BTU (MMBTU) per hour but less than 10,000 MMBTU per hour shall not exceed an emission rate as determined by the relationship:

$$E = 0.8808 \cdot (I^{0.1667})$$

Where “E” is the emission rate in pounds per MMBTU per hour heat input and “I” is the heat input in millions of BTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(b).)

- 3.B.5 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall limit the emission of volatile organic compounds as determined by “Wood Products Protocol 1” (VOCs as WPP1) from each lumber drying kiln to no more than 4.80 pounds per thousand board feet (MBF). Additionally, the permittee shall limit the emission of VOC emissions from the combined lumber drying kilns to no more than 840.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 and modified in the Title V Operating Permit issued August 29, 2023 (to include AA-014) – PSD BACT Limit)

- 3.B.6 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall limit the throughput of dried lumber produced from the combined lumber drying kilns to no more than 350.0 million board feet (MMBF) [or 350,000.0 thousand board feet (MBF)] per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 and modified in the Title V Operating Permit issued August 29, 2023 (to include AA-014) – PSD BACT Limit)

- 3.B.7 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall limit the final moisture content of dried lumber produced within each lumber drying kiln to 10% or greater based on a rolling 30-day block average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 and modified in the Title V Operating Permit issued August 29, 2023 (to include AA-014) – PSD BACT Limit)

- 3.B.8 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall limit the maximum operating temperature of each lumber drying kiln to no more than 275.0

degrees Fahrenheit (°F) based on a rolling 30-day block average.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 and modified in the Title V Operating Permit issued August 29, 2023 (to include AA-014) – PSD BACT Limit)

- 3.B.9 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall limit the total heat input to the combined lumber drying kilns to no more than 1,018,613.0 MMBTU per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.15.C, as established in the Title V Operating Permit issued August 29, 2023 – PSD Avoidance Limit)

- 3.B.10 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

(Ref.: 40 CFR 63.2231(a) and (b); Subpart DDDD)

- 3.B.11 For Emission Point AA-008, the permittee shall not conduct active planer mill operations without simultaneously operating the cyclofilter. If the event the cyclofilter malfunctions or becomes non-operational, the permittee shall cease operations at the planer mill until the cyclofilter is returned to service.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 – PSD Avoidance Standard)

- 3.B.12 For Emission Point AA-008, the permittee shall limit the active planer mill operations to no more than 6,000.0 hours per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021 – PSD Avoidance Limit)

- 3.B.13 For Emission Point AA-008, the permittee shall operate the cyclofilter in such a manner as to maintain a differential pressure drop (ΔP) that is equal to / greater than 0.2 inches of water and less than / equal to 6.0 inches of water during active planer mill operations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the PSD Permit to Construct issued April 7, 2021)

- 3.B.14 For Emission Point AA-011, the permittee shall implement and maintain one of the following practices in order to minimize the emission of VOCs from the applicable storage tanks:

- (a) Only apply a surface coating to a storage tank with a coloring either described as “light” or “white”; or

(b) Install and maintain a rooftop cover within a storage tank.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 5. and 40 CFR 52.21(j), as established in the PSD Permit to Construct issued April 7, 2021 – PSD BACT Standard)

3.B.15 For Emission Points AA-012 and AA-013, the maximum permissible emission of ash and/or PM from any fossil fuel-burning installation with a heat input less than ten (10) million BTU (MMBTU) per hour shall not exceed 0.6 pounds per MMBTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).)

3.B.16 For Emission Points AA-012 and AA-013, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) and 40 CFR Part 63, Subpart A – General Provisions (as required in Table 8 in Subpart ZZZZ).

Stationary RICE is “new” if construction or reconstruction commenced on or after June 12, 2006. For new stationary RICE, the permittee shall comply with Subpart ZZZZ by complying the requirements found in either 40 CFR Part 60, Subpart IIII or JJJJ. No further requirements apply for such engines under Subpart ZZZZ.

(Ref.: 40 CFR 63.6585(a), (b), and 63.6590(c)(7); Subpart ZZZZ)

3.B.17 For Emission Points AA-012 and AA-013, any operation of the engine for any reason other than emergency operation, maintenance and testing, and operation in non-emergency situations for fifty (50) hours per year is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under the applicable regulation and shall meet all requirements for a corresponding non-emergency engine.

(a) There is no time limit on the use of an engine in emergency situations.

(b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.

(c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to

supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1) – (3); Subpart IIII)

(Ref.: 40 CFR 60.4243(d)(1) – (3); Subpart JJJJ)

- 3.B.18 For Emission Point AA-012, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 3 of Subpart JJJJ).

(Ref.: 40 CFR 60.4230(a)(4)(iv); Subpart JJJJ)

- 3.B.19 For Emission Point AA-012, the permittee shall comply with the following emission standards:

- (a) Nitrogen Oxides (NO_x): 2.0 grams per horsepower-hour [or 160 parts per million by volume dry (ppmvd) at 15% oxygen];
- (b) Carbon Monoxide (CO): 4.0 grams per horsepower-hour [or 540 parts per million by volume dry (ppmvd) at 15% oxygen]; and
- (c) Volatile Organic Compounds (VOCs): 1.0 grams per horsepower-hour [or 86 parts per million by volume dry (ppmvd) at 15% oxygen].

The permittee shall operate and maintain the engine in such a manner to achieve the emission standards over the entire life of the engine.

(Ref.: 60.4233(e), 60.4234, and Table 1; Subpart JJJJ)

- 3.B.20 For Emission Point AA-012, the permittee may operate the engine using propane as an alternative fuel for a maximum of one hundred (100) hours per calendar year only during emergency operations.

(Ref.: 40 CFR 60.4243(e); Subpart JJJJ)

- 3.B.21 For Emission Point AA-013, the permittee is subject to and shall comply with the applicable requirements found in 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart IIII).

(Ref.: 40 CFR 60.4200(a)(2)(ii); Subpart IIII)

- 3.B.22 For Emission Point AA-013, the permittee shall only combust diesel fuel within the engine that meets the following requirements (on a per-gallon basis):

- (a) A maximum sulfur content of fifteen (15) parts per million (ppm); and

- (b) A minimum cetane index of forty (40) or a maximum aromatic content of thirty-five (35) volume percent.

(Ref.: 40 CFR 60.4207(b); Subpart III)

3.B.23 For Emission Point AA-013, the permittee shall comply with the following emission standards:

- (a) Non-Methane Hydrocarbons (NMHC) + NO_x: 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour);
- (b) CO: 3.5 grams per kilowatt-hour (or 2.6 grams per horsepower-hour); and
- (c) PM: 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The engine shall be installed and configured in accordance with the manufacturer's emission-related specifications. Additionally, the permittee shall operate and maintain the engine in such a manner to achieve the referenced emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, and Table 4; Subpart III)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb. / MMBTU

3.C.1 The maximum permissible emission of ash and/or PM from any fossil fuel burning installations of less than ten (10) MMBTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).)

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-013	40 CFR 60.4211(a); Subpart IIII	3.D.1	NMHC + NO _x CO PM	Perform Work Practices

3.D.1 For Emission Point AA-013, the permittee shall perform the following work practices:

- (a) Operate and maintain each engine and control device (if any) according to the manufacturer's emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer; and
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable).

(Ref.: 40 CFR 60.4211(a); Subpart IIII)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the certification of compliance shall address each version of the permit. Each compliance certification shall include the following items:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C.(5)(a), (c), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Mississippi Administrative Code, Title 11, Part 2, Chapter 6, Rule 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter (i.e. April 30, July 31, October 31, and January 31) and any required annual reports shall be submitted by January 31 following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5); Subpart A)

- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the MDEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

- 5.A.8 Unless otherwise specified in Section 4, upon permit issuance, the monitoring, testing, recordkeeping, and reporting requirements of Section 5 herein supersede the requirements of any preceding permit to construct and/or operate.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3).)

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-001	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Perform a Weekly Visible Emissions Observation
AA-002 AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Monitor the Quantity of Green Wood By-Products Processed (Monthly and Rolling 12-Month Total)
AA-005 AA-006 AA-007 AA-014	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.3	Dried Lumber VOCs	Monitor the Total Throughput and Calculate Emissions (Combined Kilns) (Monthly and Rolling 12-Month Totals)
		5.B.4	Final Moisture Content	Continuously Monitor the Moisture Content of Dried Lumber Processed (Daily) Calculate the Moisture Content (Rolling 30-Day Block Average)
		5.B.5	Operating Temperature	Continuously Monitor the Operating Temperature of Each Kiln (Daily) Calculate the Operating Temperature (Rolling 30-Day Block Average)
		5.B.6	Total Heat Input	Monitor Natural Gas Usage (Combined Kilns; Monthly and Rolling 12-Month Total) Maintain Documentation on Heating Value of Natural Gas
		5.B.7	VOCs	Implement the Maintenance and Inspection Plan
AA-008	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.8	PM (filterable)	Perform a Visible Emissions Evaluation Monthly
		5.B.9	PM ₁₀ / PM _{2.5} (filterable only)	Monitor Hours of Active Planer Mill Operations (Monthly and Rolling 12-Month Total)
		5.B.10	Differential Pressure Drop	Monitor Differential Pressure Daily
		5.B.11	PM (filterable) PM ₁₀ / PM _{2.5} (filterable only)	Perform an Inspection on the Cyclofilter Monthly

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-011	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.12	VOCs	Conduct Compliance Demonstration Measures (As Applicable)
AA-012 AA-013	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.13	Emergency Engine Status	Monitor Hours of Operation Monthly (Emergency and Non-Emergency)
AA-012	40 CFR 60.4243(b)(1); Subpart JJJJ	5.B.14	NO _x CO VOCs	Recordkeeping Requirements
	40 CFR 60.4243(e); Subpart JJJJ 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.15	Alternative Fuel Usage	Monitor Hours of Operation While Combusting Propane Gas
AA-013	40 CFR 60.4114(a)(2); Subpart III	5.B.16	NMHC + NO _x	Recordkeeping Requirements
	40 CFR 60.4211(g)(2) and (3); Subpart III	5.B.17	CO PM	Conduct Compliance Demonstration Measures (As Applicable)

5.B.1 For Emission Point AA-001, the permittee shall perform a monthly visible emissions observation in accordance with EPA Test Method 22 on the ambient air outside each enclosure for the merchandiser and the sawing process during daylight hours and during representative operating conditions. The duration of each observation shall (at a minimum) be six (6) consecutive minutes.

If visible emissions are detected during an observation, the permittee shall determine the cause of the visible emissions and implement the necessary corrective actions to prevent further emissions.

The permittee shall maintain documentation that details the date / time when each observation is conducted, the results of each observation, the cause of any visible emissions detected (if possible), and any corrective actions taken to prevent emissions. Additionally, the permittee shall maintain all documentation that details any maintenance actions (preventative, corrective, etc.) performed on an enclosure to maintain the applicable reduction efficiency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.2 For Emission Points AA-002 and AA-004, the permittee shall monitor and record the total combined quantity (in tons) of green wood by-products hogged, chipped, and/or grinded on both on a monthly and a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.3 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall monitor and record the total throughput of lumber dried within the combined kilns in thousand board feet (MBF) on both a monthly and a 12-month rolling total basis.

Additionally, the permittee shall utilize the monitored dried lumber throughput data and the VOC emission factor specified in Condition 3.B.5 to calculate and record the total emission of VOCs from the combined kilns on both a monthly and a 12-month rolling total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.4 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with moisture content limit specified in Condition 3.B.7 by continuously monitoring and maintaining the moisture of dried lumber processed within the planer mill on a daily basis. The permittee shall utilize monitored moisture data to determine the overall dried lumber moisture content based on a rolling 30-day block average.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.5 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with the maximum operational temperature limit specified in Condition 3.B.8 by continuously monitoring and maintaining the actual operating temperature of each kiln on a daily basis. The permittee shall utilize this data to determine the overall operating temperature of each kiln based on a rolling 30-day block average.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.6 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall demonstrate compliance with total heat input limit specified in Condition 3.B.9 by monitoring and recording the total volume of natural gas combusted by the combined lumber drying kilns on both a monthly and rolling 12-month total basis.

Additionally, the permittee shall maintain documentation from each natural gas supplier that certifies the heating value of the natural gas received on-site (in BTU per standard unit of volume).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.7 For Emission Points AA-005, AA-006, AA-007, and AA-014, the permittee shall at all times implement the work practices, inspections, and maintenance actions outlined in the “*Maintenance and Inspection Plan*” (MIP) (dated May 16, 2022).

As necessary, the permittee shall revise and update the MIP to address changes to applicable operations and/or to incorporate additional best management practices.

Additionally, the permittee shall maintain the results of each inspection and maintenance

action (corrective or preventative) completed in accordance with (or as a result of) the MIP.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.8 For Emission Point AA-008, the permittee shall perform a visible emissions evaluation (VEE) in accordance with EPA Test Method 9 (“Method 9”) on the exhaust from the cyclofilter during daylight hours and during conditions representative of normal operation for the planer mill on a monthly basis.

In the event that a VEE is not conducted during any calendar month, the permittee shall denote and maintain an explanation as to why the VEE was not performed.

The permittee shall maintain all documentation and information specified by Method 9, the date / time in which each VEE is conducted, the results of each evaluation, and any corrective actions taken to prevent or minimize emissions as a result of an evaluation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.9 For Emission Point AA-008, the permittee shall monitor and record the total hours for active planer mill operations on both a monthly and rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.10 For Emission Point AA-008, the permittee shall demonstrate compliance with the differential pressure range specified in Condition 3.B.13 by monitoring and recording the differential pressure drop across the cyclofilter on a daily basis during active planer mill operations.

If the permittee determines the pressure drop is outside the established differential pressure drop range, the permittee shall perform the necessary corrective measures to return the cyclofilter to the established pressure drop range. Additionally, the permittee shall maintain documentation that details any corrective actions performed on the cyclofilter as a result of an out-of-range differential pressure reading.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.11 For Emission Point AA-008, the permittee shall perform an inspection that evaluates the performance capability of the cyclofilter on a monthly basis. If a problem is noted during an inspection of the cyclofilter, the permittee shall perform the necessary maintenance to ensure operation as originally designed. Additionally, the permittee shall maintain on-site (to the best extent practicable) sufficient components as is necessary to repair the cyclofilter.

The permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, any problem(s) that is detected, any maintenance (either corrective or preventative) performed to return the cyclofilter to operation as originally designed, and the duration in which the cyclofilter is non-operational due to malfunction.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.12 For Emission Point AA-011, the permittee shall demonstrate compliance the standards specified in Condition 3.B.14 in accordance with the following requirements (as applicable):

- (a) Maintain documentation that indicates the surface coating on each storage tank complies with the specified color requirement; or
- (b) Perform a visual inspection of each rooftop cover that evaluates the corresponding structural integrity inspection on an annual basis and no later than thirteen (13) months after the previously completed inspection. Additionally, the permittee shall maintain documentation that details the date / time of each inspection, the results of each inspection, and any actions taken (preventative or maintenance) as a result of the inspection.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.13 For Emission Points AA-012 and AA-013, the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an “emergency” or a “non-emergency”.

(Ref.: 40 CFR 60.4245(b); Subpart JJJJ and 40 CFR 60.4214(b); Subpart IIII)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.14 For Emission Point AA-012, the permittee shall maintain documentation that details the following information (as applicable):

- (a) Confirmation that the purchased spark-ignition internal combustion engine is certified to the emission standards specified in Condition 3.B.19;
- (b) If the permittee operates and maintains the engine in accordance with the manufacturer’s emission-related written instructions, the permittee must maintain records of conducted maintenance to demonstrate compliance with the specified emission standards.

Additionally, the permittee shall meet the requirements as specified in 40 CFR Part 1068, Subparts A through D (as applicable). If the permittee adjusts engine settings according to and consistent with the manufacturer’s instructions, the engine **will not** be considered out-of-compliance.

- (c) If the permittee does not operate and maintain the engine in accordance with the manufacturer’s emission-related written instructions, the engine will be considered a non-certified engine. As such, the permittee must keep a maintenance plan, retain records of conducted maintenance to demonstrate compliance, and maintain /

operate the engine in a manner consistent with good air pollution control practice for minimizing emissions (to a practicable extent).

(Ref.: 40 CFR 60.4243(b)(1); Subpart JJJJ)

- 5.B.15 For Emission Point AA-012, the permittee shall monitor and record the duration (in hours) in which the engine operates with propane as a fuel source on a monthly basis. Additionally, the permittee shall maintain documentation that details the circumstance(s) for the use of propane as a fuel source (in lieu of natural gas).

If propane is used for more than one hundred (100) hours in a calendar year for an engine that is not certified to the emission standards specified in Condition 3.B.19 when using propane gas, the permittee shall conduct a performance test in accordance with 40 CFR 60.4233, Subpart JJJJ to demonstrate compliance with the denoted emission standards.

(Ref.: 40 CFR 60.4243(e); Subpart JJJJ)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.16 For Emission Point AA-013, the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted must comply with Subpart IIII;
- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that indicates the engine is certified to meet the emission standards specified in Condition 3.B.23.

(Ref.: 40 CFR 60.4114(a)(2); Subpart IIII)

- 5.B.17 For Emission Point AA-013, the permittee shall demonstrate compliance through the emission standards specified in Condition 3.B.23 through the following actions **if** the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan, records of conducted maintenance, and (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) The permittee shall conduct an initial performance test in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart IIII (as applicable) to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines:
 - (1) Within one (1) year of start-up, or
 - (2) Within one (1) year after the engine is no longer installed, configured,

operated, and maintained in accordance with the manufacturer's emission-related written instructions, or

- (3) Within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g)(2) and (3); Subpart IIII)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).	5.C.1	VOCs Material Throughputs Final Moisture Content Operating Temperature Total Heat Input PM / PM ₁₀ / PM _{2.5} (filterable only)	Submit a Semi-Annual Monitoring Report
AA-014	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.2	VOCs	Submit a Notification on the Initial Start-Up of the Kiln

- 5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that contains the following information (as applicable):
- (a) *For Emission Point AA-001* – Any maintenance actions performed on the building and/or enclosure in order to maintain the reduction efficiencies specified in Condition 3.B.2;
 - (b) *For Emission Points AA-002 and AA-004* – the total combined quantity of green wood by-products hogged, chipped, and/or grinded in tons on both a monthly and rolling 12-month total basis;
 - (c) *For Emission Points AA-005, AA-006, AA-007, and AA-014* – the report the include the following information:
 - (1) The total throughput of dried lumber produced from the combined kilns in thousand board feet (MBF) on both a monthly and rolling 12-month total;
 - (2) The total emission of VOCs from the combined kilns in tons on both a monthly and rolling 12-month total;
 - (3) The moisture of all dried lumber processed based on a rolling 30-day block average;
 - (4) The operating temperature of each kiln based on a rolling 30-day block average;

- (5) The total heat input of all kilns combined in MMBTU (as well as the total volume of natural gas combusted) based on a monthly and rolling 12-month total basis; and
 - (6) A summary of revisions made to the MIP during the reporting period and a copy of the updated MIP;
- (d) For Emission Point AA-008 – the report shall include the following information:
- (1) Any maintenance action(s) performed on the cyclofilter and any periods of time (including the date and duration) in which the cyclofilter was non-operational due to malfunction;
 - (2) For each differential pressure drop excursion: the date / time of the excursion, the cause for the excursion (if known), any corrective action(s) taken as a result of the excursion, and the date in which the operational differential pressure drop returned to the established range; and
 - (3) The total hours of active planer mill operations on both a monthly and rolling 12-month total basis.
- (e) For Emission Points AA-012 and AA-013 – the hours of operation for each engine (including a summary on how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for non-emergency operation).

5.C.2 For Emission Point AA-014, the permittee shall submit a notification to the MDEQ that details the initial start-up of the kiln no later than fifteen (15) days after the actual date.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
MDEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr / dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb. / hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61, or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
PM _{2.5}	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound